

<b>UNITED STATES BANKRUPTCY COURT DISTRICT OF NEW JERSEY</b>	<b>CASE NO.:</b> 16-27070-KCF  <b>CHAPTER</b> 13  <b>HEARING DATE:</b> April 25, 2018 at 9:00 am  <b>JUDGE:</b> Kathryn C. Ferguson
<b>Robertson, Anschutz &amp; Schneid, PL</b> 6409 Congress Ave., Suite 100 Boca Raton, FL 33487 Telephone Number 561-241-6901 Attorneys For Secured Creditor  KEVIN BUTTERY, Esq. (KB - 3800)	
<b>In Re:</b>  <b>Guido James Maurino</b>  <b>Debtor,</b>  <b>Cynthia Barbara Maurino</b>  <b>Joint Debtor.</b>	

**NOTICE OF MOTION FOR RELIEF FROM AUTOMATIC STAY**

**HEARING DATE AND TIME:**  
April 25, 2018 at 9:00 am

**ORAL ARGUMENT IS REQUESTED IN THE EVENT  
OPPOSITION IS TIMELY FILED**

**TO:**

Debtor: Guido James Maurino, 164 Colony Lane, Manalapan, NJ 07726

Joint Debtor: Cynthia Barbara Maurino, 164 Colony Lane, Manalapan, NJ 07726

Attorney for Debtors: Javier L. Merino, Dann & Merino, P.C., 1 Meadowlands Plaza, Suite 200  
Room 252, East Rutherford, NJ 07073

Trustee: Albert Russo, Standing Chapter 13 Trustee, CN 4853, Trenton, NJ 08650-4853

PLEASE TAKE NOTICE that on April 25, 2018 at 9:00 am, or as soon thereafter as counsel may be heard, Robertson, Anschutz & Schneid, PL attorneys for HSBC BANK USA, NATIONAL ASSOCIATION, AS TRUSTEE FOR FREMONT HOME LOAN TRUST 2005-D, MORTGAGE-BACKED CERTIFICATES, SERIES 2005-D, the within creditor ("Creditor"), shall move before the Honorable Kathryn C. Ferguson, United States Bankruptcy Judge, at 402 East State Street, Trenton, N.J. 08608, Courtroom #2, for an Order pursuant to 11 U.S.C. §362(d)(1) granting such Creditor relief from automatic stay or, for costs and disbursements of this action, and for such other and further relief as to the Court may seem just and proper.

PLEASE TAKE FURTHER NOTICE that in support of the Motion, the undersigned shall rely on the accompanying Certification in Support of Motion for Relief. A proposed form of Order is also being submitted. A Memorandum of Law has not been submitted because the issues raised by the Motion are not extraordinary or unusual necessitating the filing of legal briefs.

PLEASE TAKE FURTHER NOTICE that objections, if any, to the relief requested in the Motion shall: (i) be in writing; (ii) specify with particularity the basis of the objection; and (iii) be filed with the **CLERK, UNITED STATES BANKRUPTCY COURT, 402 East State Street, Trenton, N.J. 08608**, and simultaneously served on Secured Creditor's counsel, **Robertson, Anschutz & Schneid, P.L. 6409 Congress Ave., Suite 100 Boca Raton, FL 33487, Telephone Number 561-241-6901**, so as to be received no later than seven (7) days before the return date set forth herein.

PLEASE TAKE FURTHER NOTICE that unless objections are timely filed and served, the Motion shall be deemed uncontested in accordance with D.N.J. LBR 9013-1(a) and the relief requested may be granted without a hearing.

PLEASE TAKE FURTHER NOTICE that counsel hereby requests oral argument in accordance with D.N.J. LBR 9013-1 (f) in the event opposition papers are timely filed.

DATED: 3.22.18

**Robertson, Anschutz & Schneid, P.L.**

6409 Congress Ave., Suite 100

Boca Raton, FL 33487

Telephone Number 561-241-6901

By: /s/ Kevin Buttery

Kevin Buttery, Esquire

NJ I.D. (KB-3800)

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